

# Monsanto

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LAW DEPARTMENT

Monsanto Company  
800 N. Lindbergh Boulevard  
St. Louis, Missouri 63167  
Phone: (314) 694-1000

January 16, 1995

**Via Federal Express**

Marsha A. Adams  
5 HMS-5J Responsible Party  
Search Section  
U.S. Environmental Protection Agency,  
Region V  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

Re: Sauget Area I, Sauget, Illinois

Dear Ms. Adams:

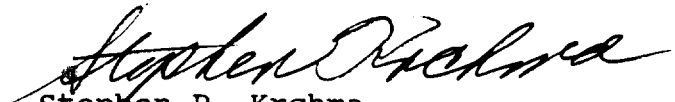
Monsanto hereby provides a further response to the U.S. Environmental Agency (EPA) Request for Information pursuant to Section 104(e) of CERCLA for the Sauget Area I in Sauget, Illinois, dated July 13, 1994. Monsanto received the Information Request on July 18, 1994, and by letter dated July 28, 1994, made arrangements for a phased response on several specified subject areas. Specifically, voluminous documentation was produced by Monsanto for EPA's inspection on two different occasions from the litigation in Cerro Copper Products Company v. Monsanto Company and Monsanto Chemical Company, Docket No. 92-CV-204-WDS (USDC SD IL). The enclosed box of documents represents those items selected by EPA in its inspections.

Please note that these documents are submitted to EPA under the same conditions as specified in our October 17, 1994 letter. Furthermore, as explained to EPA at the time of the document inspections, portions of certain of the documents have been redacted based upon relevancy and/or privilege as attorney/client communications or attorney work product.

Monsanto also asserts a business confidentiality claim covering certain of the documents, as identified by the list attached hereto, pursuant to 40 CFR, Part 2, Subpart B. In response to your October 27, 1994 letter requesting substantiation of similar CBI claims in earlier submittals, our comments on these documents are the same as our December 15, 1994 CBI position for the earlier submittals.

If you have any questions concerning Monsanto's position in this matter, please contact the undersigned at 314/694-1278.

Very truly yours,

  
Stephen P. Krchma  
Environmental Counsel

Attach.

cc: Thomas J. Martin  
Assistant Regional Counsel  
U.S. EPA, Region V (w/o Attach.)

SAUGET AREA I, SAUGET, ILLINOIS

CONFIDENTIAL BUSINESS INFORMATION  
CLAIMS FOR MONSANTO COMPANY SUBMISSIONS TO  
U.S. ENVIRONMENTAL PROTECTION AGENCY (JANUARY 6, 1995)

Box 1, Folder I-F-52

"Plant Sewer Map" dated June 7, 1971 (CER 069621 and CER 069652)

"W.G. Krummrich Plant History" dated April 30, 1957 (CER 069912-924)

Box 4, Folder I-F-92

"Near Miss Accident Investigation" dated April 17, 1973 (CER 095484-501)

"Zone A April Safety Meeting" dated March 13, 1980 (CER 095502-505)

Box 5, Folders I-F-108 and 110

"MCC Waste Elimination" dated January 18, 1989 (CER 106728-811)

"MCC Waste Elimination (1987 Data)" dated February 27, 1989 (CER 106812-827)

"Plant Effluent Analysis" dated January 24, 1989 (CER 107588-599)

Box 6, Folders P-1 and P-13

"Plant Sewer Map" dated June 7, 1971 (CER 000001)

"Sewer Mains - Plant B" dated April 13, 1959 (CER 008830)

"Plat Showing Sewers - West Side" dated October 19, 1933 (CER 008831)

"Proposed S. WGK Laterals" dated August 24, 1964 (CER 008833)

"WGK Plant Layout Sewer System" dated April 22, 1993 (CER 008834)

"Survey May 13" (CER 008836)

Box 13, Folders 92 and 94

"Cerro Copper Meeting" dated August 13, 1991 (CER 053234-235)

"Flammable Containment" (CER 055890)

Box 14, Folder P-F-110

"Incident Investigation, Department 233" dated March 16, 1987 (CER 089152-161)

"Process Losses - Department 221" dated June 9, 1977 (CER 089473-474)

"Calculations - MCB Balance - May 1977" (CER 089475-477)

"MCB Benzene Reduction" dated December 29, 1980 (CER 090445-447)

"CEA 3322 - MCB Benzene Reduction Interim Compliance" dated December 12, 1978 (CER 090453-468)

"Water Pollution Control - W.G. Krummrich Plant" dated July 16, 1974 (CER 092185-221)

"Engineering Flow Diagram" dated February 8, 1967 (CER 093508-509)

"Distillation 100/500" dated November 1968 (CER 093510)

"WGK Plant Layout Sewer System" dated February 22, 1991 (CER 093515)

"Pre-Project Environmental Control Review - CEA 3808, Main South Trunk Sewer, WGK" dated July 16, 1982 (CER 095470-471)

"MCI PIR No. 3808 Main South Trunk Sewer - W.G. Krummrich" dated November 16, 1982 (CER 095472-477)

"Answers to U.S. EPA Questionnaire on TCDD (10/3/83)" (CER 097764-774)

Box 15, Folders PF-122 and 125

"Layout of Sewers" dated February 7, 1941 (CER 111917)

"Foundation Details and Sewer Locations" dated March 10, 1967 (CER 111924)

"Definition of WGK Waste Streams" dated October 14, 1977 (CER 112221-223)

"Relief Sewer Plan and Profile" dated October 5, 1948  
(CER 113128)

"Long-Range Sewer Plan - WGK Plant" dated May 4, 1964  
(CER 113140-196)

"Pipe Map 13" (CER 113131)

Box 16, Folder PF-152

"Potential Metallic Pollutants - W.G. Krummrich Plant" dated  
October 9, 1970 (CER 130539-548)